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*Attorneys for Plaintiff  
Entropic Communications, LLC*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS, LLC,  
Plaintiff,  
v.  
DISH NETWORK CORPORATION, *et al.*  
Defendants

Case No.: 2:23-cv-01043-JWH-KES  
(Lead Case)  
Case No.: 2:23-cv-01047-JWH-KES  
(Related Case)  
Case No.: 2:23-cv-01048-JWH-KES  
(Related Case)  
Case No.: 2:23-cv-05253-JWH-KES  
(Related Case)

**DECLARATION OF CASSIDY  
YOUNG IN SUPPORT OF  
PLAINTIFF'S NOTICE OF  
MOTION AND MOTION FOR  
RECONSIDERATION OF  
COURT'S ORDER ON  
COMCAST'S MOTION TO  
DISMISS [DE 132]**

Date: January 5, 2023  
Time: 9:00 AM  
Courtroom: 9D (Santa Ana)

1 ENTROPIC COMMUNICATIONS, LLC,

2 Plaintiff,

3 v.

4 COMCAST CORPORATION, *et al.*,

5 Defendants.

6 ENTROPIC COMMUNICATIONS, LLC,

7 Plaintiff,

8 v.

9 DIRECTV, LLC, *et al.*,

10 Defendants.

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1                   **DECLARATION OF CASSIDY T. YOUNG**

2                   I, Cassidy T. Young, declare as follows:

3                   1. I am an attorney duly licensed to practice law in the State of California and  
4 admitted to practice before this Court. I am an associate at the law firm of K&L Gates  
5 LLP (the “Firm” or “K&L Gates”). I am one of the attorneys on the K&L Gates team  
6 representing Plaintiff Entropic Communications, LLC (“Entropic”) in the above-  
7 entitled action. This declaration is based on personal knowledge of the matters set forth  
8 in this declaration and based on documents on file with the Court and maintained in the  
9 ordinary course of business as part of the Firm’s client files in this action. If called upon  
10 to testify regarding these matters, I could and would do so competently.

11                  2. On August 8, 2023, my colleague James Shimota, sent an email to counsel  
12 for Comcast that stated: “In preparing for oral argument including the statements in  
13 Comcast’s reply brief regarding the inapplicability of DJ cases to the subject matter  
14 jurisdiction issues, we located a body of case law that we believe is dispositive of the  
15 Rule 12(b)(1) motion. We assume that Comcast had not located these cases previously  
16 since they were not cited to the Court. We intend to present them to the Court tomorrow.  
17 providing them with a list of cases that had been found when preparing for the hearing  
18 on Comcast’s motions to dismiss.” The email then listed the cases that Entropic  
19 intended to present during the hearing the following day. I was copied on that email.  
20 I have attached a true and correct copy of that email to this declaration as **Exhibit A**.

21                  3. Shortly before the hearing on Comcast’s Motion, the Court issued a  
22 tentative ruling. Attached hereto as **Exhibit B** is a true and correct copy of the tentative  
23 ruling that I received via email from the Court on the morning of August 9, 2023.

24                  4. Attached hereto as **Exhibit C** is a true and correct copy of relevant portions  
25 of the transcript from the August 9 hearing on Comcast’s motions to dismiss, which I  
26 ordered and received from the court reporter who was present at the hearing.

27                  5. I, and my colleague, Kelsi Robinson, provided the Court and opposing  
28 counsel with a copy of the slide deck used by Entropic during the hearing on Comcast’s

1 motions to dismiss. These slides were then filed with the Court after the hearing and  
2 are found at docket entry number 118. My colleague, Kelsi Robinson, also provided  
3 the Court with copies of the new cases referenced in Mr. Shimota's email attached as  
4 Exhibit A.

5       6. Due to the short deadline for filing this Motion according to Local Rule 7-  
6 18 and the inevitable delays arising from the intervening Thanksgiving Holiday, I sent  
7 an email to Comcast to meet and confer on the motion for reconsideration on November  
8 29, 2023. I, along with my colleague, Peter Soskin, met and conferred with counsel for  
9 Comcast via video conference regarding the motion for reconsideration on December  
10 1, 2023, which was the first date that Comcast's counsel (Mr. Padmanabhan) gave us  
11 on which he was available to meet and confer.

12        7. During the meet and confer, I offered to jointly request an extension of  
13 time to file its motion to give Comcast more time to consider Entropic's position;  
14 however, Comcast's counsel (Mr. Padmanabhan) declined the offer and suggested that  
15 additional time for consideration was not necessary. Indeed, he confirmed that the  
16 additional time would not change Comcast's position, which was to oppose the Motion.

17       8. The parties discussed the substance of the motion for reconsideration and  
18 followed it up with an email that contained additional authority to support Entropic's  
19 motion for reconsideration. The parties were unable to reach an agreement during the  
20 meet and confer.

I declare under penalty of perjury under the laws of the United States and California that the foregoing is true and correct.

24 Executed on December 4, 2023 in Los Angeles, California.

Cassidy Young  
Cassidy T. Young

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